

Christopher D. Moon, SBN 246622
chris@moonlawapc.com

Kevin O. Moon, SBN 246792
kevin@moonlawapc.com

MOON LAW APC

228 Hamilton Ave., 3rd Fl
Palo Alto, California 94301
Telephone: (619) 915-9432
Facsimile: (650) 618-0478

Attorneys for Caroline Schneider

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

PG&E Corporation,

and

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088-DM

Chapter 11

Lead Case, Jointly Administered

**MOTION PURSUANT TO FED. R.
BANKR. PROC. 7015 AND 7017 TO
ENLARGE TIME TO FILE PROOF OF
CLAIM PURSUANT TO FED. R. BANKR.
PROC. 9006(b)(1)**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case, No.
19-30088-DM

Date: February 15, 2022

Time: 10 a.m. (Pacific Time)

Place: **Telephonic/Video Appearances Only**

United States Bankruptcy Court

Courtroom 17,

450 Golden Gate Ave., 16th Floor
San Francisco, CA

Judge: Hon. Dennis Montali

Objection deadline: February 8, 2022

1 Pursuant to Rules 7015 and 7017 of the Federal Rules of Bankruptcy Procedure, which
2 incorporate Federal Rules of Civil Procedure 15 and 17, by this motion (“Motion”) Caroline
3 Schneider (“Movant”) seeks an order expanding the time to file her proof of claim. Movant filed
4 the proof of claim #108022 after the deadline.

5 This Motion is based upon the points and authorities set forth herein and the concurrently
6 filed Notice of Hearing and Declaration of Christopher D. Moon (“Moon Decl.”) in support of
7 the Motion, in addition to any evidence or oral argument presented at the time of any hearing on
8 this matter. In support thereof, the Movant, by and through her undersigned counsel, respectfully
9 represent as follows:

10 SUMMARY OF ARGUMENT

11 The general bar date in these cases was October 21, 2019 (“Original Bar Date”). The
12 process for submission of timely claims was continued after the Original Bar Date. Pursuant to
13 the Stipulation Between Debtors and Official Committee of Tort Claimants to Extend Bar Date
14 for Fire Claimants and for Appointment of Claims Representative (Dkt No. 4651), the Original
15 Bar Date was extended for the benefit of Unfiled Fire Claimants to December 31, 2019 at 5:00
16 p.m. (Prevailing Pacific Time) and then extended again to February 26, 2021 at 5:00 p.m.
17 (Prevailing Pacific Time). The Debtors’ Chapter 11 plan (“Plan”) was confirmed by court order
18 on June 20, 2020, and pursuant to the Notice of Effective Date, the Plan became effective as of
19 July 1, 2020.

20 This Motion concerns the claim of Caroline Schneider. Ms. Schneider incorrectly
21 believed she did not have a valid claim because she rented her residence in Magalia at the time of
22 the Camp Fire. It was not until recently that Ms. Schneider learned for the first time that she
23 could still seek damages for her losses from the Camp Fire despite not owning the property in
24 which she resided at the time of the fire.

25 Under Rules 7015 and 7017 of Federal Bankruptcy Procedure (which incorporate Federal
26 Rules of Civil Procedure 15(c) and 17(a)(3)), because there is a lack of bad faith on the part of
27 Movant and her counsel, the mistake should be corrected by permitting the late filing of the
28 proof of claim under Bankruptcy Rule 9006(b).

Application of the so-called *Pioneer* factors shows that Movant’s late filing is the result
of excusable neglect and therefore permissible under Rule 9006(b)(1). As to the first such factor,
Movant’s late filing will cause no prejudice to Debtors, inasmuch as the Plan has been

1 confirmed, the associated Fire Victim Trust funded, and so the inclusion of Movant's claim in
2 the pool of fire victim claims will have no impact at all on the Debtors or the bankruptcy estates.
3 As to the second *Pioneer* factor, Movant's delay in filing her claim and any resultant impact on
4 these proceedings are exceedingly modest and immaterial for the same reasons that Debtors will
5 not be prejudiced. As to the third *Pioneer* factor, the reason for the delay and whether it was in
6 Movant's reasonable control, is that Ms. Schneider only recently learned for the first time that
7 she could still pursue damages for her losses from the Camp Fire despite not owning her
8 residence in Magalia at the time of the fire. Upon learning of her rights, Ms. Schneider promptly
9 contacted Moon Law and, thereafter, filed her Proof of Claim on December 27, 2021. Movant
10 acted in good faith, satisfying the fourth *Pioneer* factor. Because consideration of the *Pioneer*
11 factors points overwhelmingly to Movant's "neglect" having been excusable, late filing of the
12 proof of claim should be permitted.

13 JURISDICTION AND VENUE

14 The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334,
15 the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24
16 (N.D. Cal.), and Rule 5011-l(a) of the Bankruptcy Local Rules for the United States District
17 Court for the Northern District of California. This is a core proceeding pursuant to 28 U.S.C. §
18 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory
19 predicates for the relief requested herein are Rules 7015, 7017, and 9006(b)(1) of the Federal
20 Rules of Bankruptcy Procedure.

21 BACKGROUND

22 As set forth in the Declaration of Christopher D. Moon filed contemporaneously
23 herewith, Ms. Schneider incorrectly believed she did not have a valid claim because she rented
24 her residence in Magalia at the time of the Camp Fire. It was not until recently that Ms.
25 Schneider learned for the first time that she could still seek damages for her losses from the
26 Camp Fire despite not owning the property in which she resided at the time of the Camp Fire.
27 Upon learning of her rights, Ms. Schneider promptly contacted Moon Law and, thereafter, filed
28 her Proof of Claim on December 27, 2021.

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

[T]he court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order or (2) on motion made after the expiration of the specified period permit the act to be done where the failure to act was the result of excusable neglect.

With regard to determining whether a party's neglect of a deadline is excusable ... we conclude that the determination is at bottom an equitable one, taking account of all relevant circumstances surrounding the party's omission. These include ... [1] the danger of prejudice to the [nonmovant], [2] the length of the delay and its potential impact on judicial proceedings, [3] the reason for the delay, including whether it was within the reasonable control of the movant, and [4] whether the movant acted in good faith.

In this case, because there is no danger of prejudice to the Debtors (or anyone else), the first *Pioneer* factor weighs overwhelmingly in Movant’s favor. *See In re Parrott Broad. Ltd. P’ship*, 518 B.R. 602, 609 (Bankr. D. Idaho 2014) (“The burden of showing prejudice is on the party objecting to the amendment.”). Any prospect of prejudice is especially unlikely here because of the form of Debtors’ Plan, which provided for a lump-sum payment for the benefit of fire victims. Adding or subtracting claims from the totals does not affect that formulation of the Plan, or in any real way affect the estate.

~~Case: 19-30088 Doc# 11786 Filed: 01/03/22 Entered: 01/03/22 22:11:08 Page 4 of 21~~

1 As to the third *Pioneer* factor, the reason for the delay and whether it was in Movant's
2 reasonable control, again weighs in favor of excusability. Movant acknowledges this Court's
3 observation, in 2004, that "[o]n balance, ... the authorities construing *Pioneer* weigh the reasons
4 for the delay factor most heavily." *In re Pacific Gas & Electric, Co.*, 311 B.R. 84, 91 (Bankr.
5 N.D. Cal. 2004) (citing *Graphic Communications Int 'l Union, Local 12-N v. Quebecor Printing*
6 *Providence, Inc.*, 270 F.3d 1 (1st Cir. 2001)).¹ A "satisfactory explanation for the late filing" is
7 required. *Graphic Communications* at 5. Here, Ms. Schneider incorrectly believed that she did
8 not have a right to pursue damages for her losses from the Camp Fire because she did not own
9 the property in Magalia in which she resided at the time of the fire. Once she learned recently
10 that she still had a valid claim despite not owning her residence, Ms. Schneider promptly
11 contacted Moon Law and, thereafter, filed her proof of claim on December 27, 2021.

12 Finally, and for the same reasons, as to the fourth *Pioneer* factor there is no reasonable
13 suggestion that Movant failed to act in good faith.

14 It is also critical to note that an order granting this Motion is of course without prejudice
15 to the rights of relevant parties (the Trustee of the Fire Victim Trust for example) to object to the
16 Movant's claim on substantive or legal grounds, other than timeliness.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ¹ That said, the Fifth and Eleventh Circuits and courts in at least two other circuits (the Third and
25 the Eighth) have identified the danger of prejudice is the most important of the *Pioneer* factors.
26 See *Greyhound Lines, Inc. v. Rogers (In re Eagle Bus Mfg., Inc.)*, 62 F.3d 730, 737 (5th Cir.
27 1995) ("Under *Pioneer*, the central inquiry is whether the debtor will be prejudiced."); *Advanced*
28 *Estimating System, Inc. v. Riney*, 77 F.3d 1322, 1325 (11th Cir. 1996) ("Primary importance
should be accorded to the absence of prejudice to the nonmoving party and to the interest of
efficient judicial administration."); *In re Cable & Wireless USA, Inc.*, 338 B.R. 609,614 (Bankr.
D. Del. 2006) (quoting *In re Tannen Towers Acquisition Corp.*, 235 B.R. 748, 755 (D.N.J. 1999)
("In applying the *Pioneer* test, courts place the greatest weight on whether any prejudice to the
other parties will occur by allowing a late claim."); *Matter of Papp Intern., Inc.*, 189 B.R. 939,
944 (Bankr. D. Neb. 1995) (citing *In re Sacred Heart Hos. of Norristown*, 186 B.R. 891 as
suggesting "the most significant [*Pioneer*] factor ... is that of prejudice to the debtor.").

1 **CONCLUSION**

2 For the reasons set forth above, Movant respectfully request that this Court enter an order
3 pursuant to Bankruptcy Rules 7015, 7017, and 9006(b)(1) as follows:

- 4 1. Granting this Motion;
- 5 2. Directing that the Proof of Claim, attached as Exhibit A hereto, be deemed timely filed;
6 and
- 7 3. Granting such other or further relief as the Court deems just and proper.

8 Dated: December 30, 2021

MOON LAW APC

9 By:

10 

11 _____
12 CHRISTOPHER D. MOON

13 KEVIN O. MOON

14 *Attorneys for Caroline Schneider*

1 Christopher D. Moon, SBN 246622
2 *chris@moonlawapc.com*
3 Kevin O. Moon, SBN 246792
4 *kevin@moonlawapc.com*
5 **MOON LAW APC**
6 228 Hamilton Ave., 3rd Fl
7 Palo Alto, California 94301
8 Telephone: (619) 915-9432
9 Facsimile: (650) 618-0478
10
11 *Attorneys for Caroline Schneider*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
PG&E Corporation,
and
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**DECLARATION OF CHRISTOPHER D.
MOON IN SUPPORT OF MOTION
PURSUANT TO FED. R. BANKR. PROC.
7015 AND 7017 TO ENLARGE TIME TO
FILE PROOF OF CLAIM PURSUANT TO
FED. R. BANKR. PROC. 9006(b)(1)**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case, No.
19-30088-DM

Date: February 15, 2022
Time: 10 a.m. (Pacific Time)
Place: **Telephonic/Video Appearances Only**
United States Bankruptcy Court
Courtroom 17,
450 Golden Gate Ave., 16th Floor
San Francisco, CA
Judge: Hon. Dennis Montali

Objection deadline: February 8, 2022

1 I, Christopher D. Moon, hereby declare:

- 2 1. I am an attorney at law duly license to practice before all state and federal courts of the
3 State of California. I am a managing partner with the law firm Moon Law APC, based in
4 Palo Alto, California.
- 5 2. My law firm represents wildfire victims who sustained losses from the Camp Fire in
6 2018. My firm has timely filed over 50 Proof of Claim forms with Prime Clerk for losses
7 clients have suffered as a result of the fire.
- 8 3. Claimant Caroline Schneider informed me in December 2021 that she had incorrectly
9 believed that she did not have a valid claim to recover damages for her losses from the
10 Camp Fire because she did not own the property in Magalia in which she resided at the
11 time of the fire. Upon learning for the first time in December 2021 that she may still have
12 a valid claim despite not being a property owner at the time of the Camp Fire, Ms.
13 Schneider promptly contacted my law firm and, thereafter, we caused a Proof of Claim to
14 be filed on her behalf on December 27, 2021.
- 15 4. I am over eighteen years of age, of sound mind, and fully competent to make this
16 declaration. All statements in this declaration are based on my own personal knowledge
17 and observation and from my review of the court and business records in this case, or
18 upon information and belief as indicated. If called to testify on this matter, I can and
19 would competently testify to the matters set forth in this Declaration.
- 20 5. I declare under penalty of perjury pursuant to the laws of the United States of America
21 that the foregoing is true and correct.

22 Executed this 30th day of December, 2021, in Palo Alto, California.

23
24
25
26
27
28



CHRISTOPHER D. MOON

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?		Schneider, Caroline Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Schneider, Caroline</u> Attorney Name (if applicable) <u>Christopher D. Moon</u> Attorney Bar Number (if applicable) <u>246622</u> Street Address <u>600 West Broadway, Suite 700</u> City <u>San Diego</u> State <u>CA</u> Zip Code <u>92101</u> Phone Number <u>619-915-9432</u> Email Address <u>chris@moonlawapc.com</u>		Where should payments to the creditor be sent? (if different) Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____
	5. Does this claim amend one already filed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____		Filed on _____ MM / DD / YYYY
6. Do you know if anyone else has filed a proof of claim for this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____			

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim? Check all that apply.	<input checked="" type="checkbox"/> Camp Fire (2018) <input type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different?)	Location(s): 13662 Nimshew Rd., Magalia, CA 95954 13658 Nimshew Rd., Magalia, CA 95954
9. How were you and/or your family harmed? Check all that apply	<input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Renter <input type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): _____ <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) _____ <input checked="" type="checkbox"/> Business Loss/Interruption <input checked="" type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input checked="" type="checkbox"/> Agricultural loss <input type="checkbox"/> Other (Please specify): _____
10. What damages are you and/or your family claiming/seeking? Check all that apply	<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____
11. How much is the claim?	<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Christopher D. Moon
Christopher D. Moon (Dec 27, 2021 06:51 PST)

Email: chris@moonlawapc.com

Signature

Print the name of the person who is completing and signing this claim:

Name	<u>Christopher Decker Moon</u>			
	First name	Middle name	Last name	
Title	<u>Attorney</u>			
Company	<u>Moon Law APC</u>			
	Identify the corporate servicer as the company if the authorized agent is a servicer.			
Address	<u>600 West Broadway, Suite 700</u>			
	Number	Street		
	<u>San Diego</u>		CA	92101
	City		State	ZIP Code
Contact phone	<u>619-915-9432</u>		Email	<u>chris@moonlawapc.com</u>

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☐ I have supporting documentation.
(attach below)

☒ I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **For a minor child, fill in only the child's initials and the full name of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- **You may but are not required to attach supporting documents to this form.**
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- **Question 11.** You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/page>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 "D" Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Electronic Proof of Claim_C@IRF27402[[CSLT#4025#CF]]

Final Audit Report

2021-12-27

Created:	2021-12-27
By:	Prime Clerk E-Filing (efiling@primeclerk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAApXzWZE9hqloqzdgX0eA_siYTRRsTBddX

"Electronic Proof of Claim_C@IRF27402[[CSLT#4025#CF]]" History



Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com)

2021-12-27 - 2:45:23 PM GMT



Web Form filled in by Christopher D. Moon (chris@moonlawapc.com)

2021-12-27 - 2:51:37 PM GMT - IP address: 68.6.149.156



(User email address provided through API User-Agent: Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/96.0.4664.110 Safari/537.36)

2021-12-27 - 2:51:39 PM GMT - IP address: 68.6.149.156



Agreement completed.

2021-12-27 - 2:51:39 PM GMT

1 Christopher D. Moon, SBN 246622
2 *chris@moonlawapc.com*
3 Kevin O. Moon, SBN 246792
4 *kevin@moonlawapc.com*
5 **MOON LAW APC**
6 228 Hamilton Ave., 3rd Fl
7 Palo Alto, California 94301
8 Telephone: (619) 915-9432
9 Facsimile: (650) 618-0478
10
11 *Attorneys for Caroline Schneider*

12
13 **UNITED STATES BANKRUPTCY COURT**
14
15 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**
16
17

18 In re
19 PG&E Corporation,
20 and
21 PACIFIC GAS AND ELECTRIC
22 COMPANY,
23 Debtors.

Case No. 19-30088-DM
Chapter 11
Lead Case, Jointly Administered
CERTIFICATE OF SERVICE
Hon. Dennis Montali

24
25
26
27
28
[] Affects PG&E Corporation
[] Affects Pacific Gas and Electric Company
[x] Affects both Debtors

*All papers shall be filed in the Lead Case, No.
19-30088-DM

1 I, Christopher D. Moon, do declare and state as follows:

2
3 1. I am employed in San Diego County in the State of California. I am over the age of and
4 not a party to this action. My business address is 600 W. Broadway Ave., San Diego, CA
5 92101.

6 2. I certify that on December 30, 2021, I caused a true and correct copy of each of the
7 following documents to be served via e-mail on the Standard Party Email Service List
8 attached hereto as **Exhibit A**:

9 **NOTICE OF MOTION PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017**
10 **TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO FED. R.**
11 **BANKR. PROC. 9006(b)(1)**

12 **MOTION PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017 TO**
13 **ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO FED. R.**
14 **BANKR. PROC. 9006(b)(1)**

15 3. I certify that on December 30, 2021, I caused a true and correct copy of the above
16 documents to be served via First Class Mail on the Standard Party First Class Mail
17 Service List attached hereto as **Exhibit B**.

18 4. I have reviewed the Notice of Electronic Filing for the above-listed document, and I
19 understand that the parties listed in each NEF as having received notice through
20 electronic mail were electronically served with that document through the Court's
21 Electronic Case Filing System.

22 5. I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct and that if called upon to witness, I could and would testify
24 competently thereto.

25 Executed on December 30, 2021, at San Diego, California.

26 /s/ Christopher D. Moon
27 Christopher D. Moon
28

EXHIBIT A
Standard Parties Email Service List
Served via Email

DESCRIPTION	NAME	NOTICE NAME	EMAIL
Counsel to Debtor	Weil, Gotshal & Manges LLP	Attn: Stephen Karotkin, Jessica Liou, Matthew Goren	stephen.karotkin@weil.com matthew.goren@weil.com jessica.liou@weil.com
Counsel to Debtor	Keller & Benvenuti LLP	Attn: Tobias S. Keller, Jane Kim	tkeller@kellerbenvenuti.com jkim@kellerbenvenuti.com
Special Counsel to Debtors	Cravath, Swaine & Moore LLP	Attn: Paul H. Zumbro, Kevin J. Orsinit, George E. Zobitz, Stephen M. Kessing, Nicholas A. Dorsey, Omid H. Nasab	pzumbro@cravath.com korsini@cravath.com jzobitz@cravath.com skessing@cravath.com ndorsey@cravath.com onasab@cravath.com khansen@stroock.com
Counsel for JPMorgan Chase Bank, N.A., as DIP Administrative Agent	Stroock & Stroock & Lavan LLP	Attn: Kristopher M. Hansen, Erez E. Gilad, Matthew G. Garofalo, Frank A. Merola	egilad@stroock.com mgarofalo@stroock.com fmerola@stroock.com
Counsel for the agent under the Debtors' proposed debtor in possession financing facilities, Counsel for Citibank N.A., as Administrative Agent for the Utility Revolving Credit Facility	Davis Polk & Wardwell LLP	Attn: Eli J. Vonnegut, David Schiff, Timothy Graulich	eli.vonnegut@davispolk.com david.schiff@davispolk.com timothy.graulich@davispolk.com
Counsel to California Public Utilities Commission	Paul, Weiss, Rifkind, Wharton & Garrison LLP	Attn: Alan W. Kornberg, Brian S. Hermann, Walter R. Rieman, Sean A. Mitchell, Neal P. Donnelly	akornberg@paulweiss.com bhermann@paulweiss.com wrieman@paulweiss.com smitchell@paulweiss.com ndonnelly@paulweiss.com
Office of the United States Trustee for Region 17	Office of the United States Trustee	Attn: James L. Snyder, Esq. & Timothy Laffreddi, Esq., Marta E. Villacorta	James.L.Snyder@usdoj.gov timothy.s.laffreddi@usdoj.gov Marta.Villacorta@usdoj.gov
Interested Party United States on behalf of the Federal Energy Regulatory Commission	U.S. Department of Justice	Attn: Danielle A. Pham	danielle.pham@usdoj.gov

EXHIBIT A
Standard Parties Email Service List
Served via Email

DESCRIPTION	NAME	NOTICE NAME	EMAIL
Counsel for the Official Committee of Unsecured Creditors	Milbank LLP	Attn: Dennis F. Dunne, Samuel A. Khalil, Paul S. Aronzon, Gregory A. Bray, Thomas R. Kreller	ddunne@milbank.com skhalil@milbank.com Paronzon@milbank.com Gbray@milbank.com TKreller@milbank.com esagerman@bakerlaw.com
Counsel for Official Committee of Tort Claimants	BAKER & HOSTETLER, LLP	Attn: Eric E. Sagerman, Lauren T. Attard, Robert A. Julian, Cecily A. Dumas	lattard@bakerlaw.com rjulian@bakerlaw.com cdumas@bakerlaw.com
Counsel for Shareholder Proponents	JONES DAY	Attn: Bruce S. Bennett, Joshua M. Mester, James O. Johnston	bbennett@jonesday.com jmester@jonesday.com jjohnston@jonesday.com

EXHIBIT B
Standard Parties Hardcopy First Class Mail Service List
Served via First Class Mail

DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP
Debtors	PG&E Corporation	Attn: President or General Counsel	77 Beale Street	P.O. Box 77000	San Francisco	CA	94177
Nuclear Regulatory Commission	U.S. Nuclear Regulatory Commission	Attn: General Counsel	U.S. NRC Region IV	1600 E. Lamar Blvd.	Arlington	TX	76011
Counsel for Shareholder Proponents	JONES DAY	Attn: Bruce S. Bennett, Joshua M. Mester, James O. Johnston	555 South Flower Street	Fiftieth Floor	Los Angeles	CA	90071-2300